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Attorneys for Defendant  
NOVA WINES, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

PETE LIVINGSTON,  
  
Plaintiff,

v.

KEYA MORGAN aka KEYARASH  
MAZHARI aka KEYA MAZHARI, KEYA  
GALLERY, NOVA WINES, INC.,  
  
Defendants.

CASE NO. C06-02389 MMC

**STIPULATION AND REQUEST TO  
EXTEND PRE-TRIAL DEADLINES;  
~~[PROPOSED]~~ ORDER**

Judge: The Honorable Maxine M. Chesney

Plaintiff Pete Livingston (“Livingston”) and Defendant Nova Wines, Inc. (“Nova Wines”), through their respective counsel of record, hereby stipulate and respectfully request that the Court extend the pre-trial deadlines in this matter.

WHEREAS, the current non-expert discovery deadline is July 6, 2007

WHEREAS, the current expert designation deadline is June 15, 2007

WHEREAS, the last day to file dispositive motions is July 20, 2007;

WHEREAS, the parties are conducting a settlement conference with Judge Bernard Zimmerman on August 16, 2007

Ropers Majeski Kohn & Bentley  
A Professional Corporation  
San Jose

WHEREAS, trial is set for October 22, 2007;

The parties respectfully request a continuance of deadlines to the dates outlined below:

Last Date To Designate Experts: July 6, 2007

Rebuttal Expert Designation: July 20, 2007

Non-expert Discovery August 1, 2007

Expert Discovery Cut-off August 1, 2007

This continuance is not expected to affect any other Case Management dates to be scheduled by this Court. The further status conference is set for June 29, 2007, with the statement due June 22, 2007.

It is so stipulated.

Dated: June 15, 2007

ROPERS, MAJESKI, KOHN & BENTLEY

By: /s/ Elise R. Vasquez  
ELISE R. VASQUEZ  
Attorneys for Defendant  
NOVA WINES, INC.

Dated: June 15, 2007

LAW OFFICE OF WILLIAM SIMPICH

By: /s/ William M. Simpich  
WILLIAM M. SIMPICH  
Attorney for Plaintiff  
PETE LIVINGSTON

### ATTESTATION OF ELECTRONIC FILING

As the attorney e-filing this document, I hereby attest that William M. Simpich has concurred in this filing.

1 Dated: June 15, 2007

ROPERS, MAJESKI, KOHN & BENTLEY

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3 By: /s/ Elise R. Vasquez  
4 ELISE R. VASQUEZ  
5 Attorneys for Defendant  
6 NOVA WINES, INC.

7 **ORDER**

8 Pursuant to the foregoing stipulation of counsel, and good cause appearing therefore, it is  
9 hereby ordered that the pre-trial schedule is extended as follows:


10 Last Date To Designate Experts: July 6, 2007

11 Rebuttal Expert Designation: July 20, 2007

12 Non-expert Discovery August 1, 2007

13 Expert Discovery Cut-off August 1, 2007

14 Date: June 15, 2007

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19 MAXINE M. CHESNEY  
20 JUDGE, UNITED STATES DISTRICT COURT  
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